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December 6, 2019

VIA ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 12/19/19

Re: United States of America v. Ryan Rainford
18 Cr. 289 (SHS)
Request for Extension

MEMO ENDORSED

Dear Judge Stein:

I was appointed counsel for Mr. Rainford pursuant to the Criminal Justice Act (CJA). Mr. Rainford was convicted after trial and sentencing has been scheduled for January 2020. The Court Ordered Mr. Rainford's sentencing submission to be filed December 6, 2019. As indicated in an earlier letter, counsel has been engaged in a trial in the matter of United States v. Enock Mensah, 19 Cr. 60 (SJ) in the United States District Court for the Eastern District of New York before the Honorable Sterling Johnson, Jr. The trial began on December 2, 2019. United States v. Mensah, involves a charge of Medicaid fraud in which the Government has claimed that over 1700 separate invoices were fraudulent and preparation for that trial consumed most of November 2019. The trial is at a crucial point and the defense respectfully requests an extension of two (2) days until December 8, 2019 to submit the sentencing submission on behalf of Mr. Rainford. This is the first request for an extension of time to submit the sentencing submission. The Government consents to this request.

Respectfully submitted,

/s/

Calvin H. Scholar

cc: United States Attorney for the
Southern District of New York

SO ORDERED 12/19/19

SIDNEY H. STEIN
U.S.D.J.